

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x  
UNITED STATES OF AMERICA

: INDICTMENT

- v. -

: 18 Cr 319

JAMES EARLY,

:

Defendant.

- - - - - x

COUNT ONE

(Sexual Exploitation of a Child)

The Grand Jury charges:

1. From at least in or about July 2015 up to and including in or about March 2017, in the Southern District of New York and elsewhere, JAMES EARLY, the defendant, knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and the defendant knew and had reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in or affecting interstate and foreign commerce and mailed, and such visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means including by computer, and such visual depiction was actually transported and transmitted using any means and

facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, to wit, JAMES EARLY, the defendant, persuaded, induced and enticed a minor in Sullivan County, New York ("Victim-1") to engage in sexually explicit conduct, photograph the conduct and send the photos, via text messages, to the defendant.

(Title 18, United States Code, Section 2251(a) & (e).)

COUNT TWO

(Coercion and Enticement)

The Grand Jury further charges:

2. From at least in or about July 2015 up to and including in or about March 2017, in the Southern District of New York and elsewhere, JAMES EARLY, the defendant, using facilities and means of interstate and foreign commerce, willfully and knowingly persuaded, induced, and enticed an individual who had not attained the age of 18 years to engage in sexual activity for which a person can be charged, to wit, JAMES EARLY, the defendant, communicated with Victim-1 by cell phone and persuaded Victim-1 to engage in sexually explicit conduct,

photograph the conduct and transmit the photos, via text messages, to EARLY.

(Title 18, United States Code, Sections 2422(b) and 2427.)

Shula Cawas  
FOREPERSON

Geoffrey S. Berman  
GEOFFREY S. BERMAN  
United States Attorney

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*United States District Court*

SOUTHERN DISTRICT OF NEW YORK

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THE UNITED STATES OF AMERICA

vs.

JAMES EARLY,  
Defendant.

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**INDICTMENT**

**18 Cr.**

(In Violation of Title 18, United States Code, Sections 2251(a) & (e))  
(In Violation of Title 18, United States Code, Sections 2242(b) and 2427)

GEOFFREY S. BERMAN

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United States Attorney.

A TRUE BILL

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Foreperson.

Shula Canest